

94-88

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
RECEIVED

In re)
Application of)
COMMUNITY EDUCATIONAL ASSOCIATION)
Holly Hill, Florida)
For A Construction Permit For A New)
Noncommercial Educational FM Station on)
Channel 212A)

APR 19 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

File No. BPED-930316MF

DOCKET FILE COPY ORIGINAL

To: Administrative Law Judge Joseph Chachkin

PETITION TO INTERVENE

WCPX License Partnership, licensee of Television Station WCPX-TV, Orlando, Florida ("WCPX"), by its attorneys and pursuant to Section 1.223 of the Commission's Rules, hereby petitions to intervene in the above-captioned proceeding involving the application of Community Educational Association ("CEA") for a construction permit for a new noncommercial educational FM station on Channel 201A at Holly Hill, Florida. On March 14, 1995, Administrative Law Judge Joseph Chachkin issued his Initial Decision granting CEA's application.^{1/} However, as shown herein it was not until after the Initial Decision was released that WCPX became aware of CEA's amended application and the adverse impact it would have on WCPX-TV.

^{1/} Initial Decision, Application of Community Educational Association, Holly Hill, Florida, MM Docket No. 94-88, File No. BPED-930316MF (Mar. 14, 1995) (the "Initial Decision").

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A. Introduction

Concurrently herewith WCPX is filing a Petition for Reconsideration of Judge Chachkin's decision because CEA's operation of a noncommercial educational FM station on Channel 201A at Holly Hill, Florida, will result in interference to viewers of WCPX-TV in violation of the Commission's Rules. WCPX-TV operates on Television Channel 6 from Orlando, Florida; it is located 76 kilometers from CEA's proposed transmitter site for the operation of its noncommercial educational FM station. As such, WCPX-TV is an "affected TV Channel 6 station" within the meaning of Section 73.525(a) of the Commission's Rules and is entitled to protection from interference caused by noncommercial educational FM stations. The Commission's Rules prohibit the grant of any application for a new non-commercial educational FM station where the predicted interference area resulting from the proposed facility would contain more than 3,000 people. 47 C.F.R. § 73.525(c) (1995). As shown herein, the predicted interference area resulting from CEA's proposed facility will contain 4,238 persons in violation of Section 73.525(c). Based on these facts WCPX License Partnership has standing as a party in interest in this proceeding.

B. WCPX Was Unable to Participate in Earlier Stages of this Proceeding.

It was not possible for WCPX to participate in this proceeding at an earlier point because it was unaware of the major amendment that CEA filed in August 1994 modifying its proposal. Originally, CEA had applied to the Commission for authority to operate a noncommercial educational FM station on Channel 212A at Holly Hill, Florida. CEA's application, however, was mutually exclusive with that of Cornerstone Community

Radio, Inc. and on August 2, 1994, the two applications were designated for hearing.^{2/} On August 30, 1994, in an effort to remove the mutual exclusivity, CEA amended its application to change the requested channel to 201A, to relocate its proposed facility, and to change the proposed tower height and the antenna height above average terrain. According to the Initial Decision, CEA's amendment was accepted by the ALJ in a September 13, 1994 Memorandum Opinion and Order. Initial Decision ¶ 1. However, the September 13, 1994 Memorandum Opinion and Order was never released on public notice. Moreover, although CEA's amendment was listed as received in the FCC's Public Notices released on September 15, 1994, the Public Notice (a copy of which is attached hereto as Exhibit A) includes no information about the nature of the amendment or the changes it proposed. WCPX therefore had no way of knowing about CEA's amendment, and indeed, it was not until the release of the Initial Decision on March 20, 1995, that WCPX became aware of CEA's amended application. Given these circumstances and the level of interference that will be caused to WCPX-TV (as described below), good cause exists for WCPX's late participation in this proceeding.

C. CEA's Proposed Facility Will Interfere With Viewers' Reception of WCPX-TV.

CEA's operation of a new noncommercial educational FM station on Channel 201A will create interference to the reception of WCPX-TV's signal by viewers in excess of that permitted by the Commission's Rules. Section 73.525(c) of the Commission's Rules provides that the predicted interference area resulting from the operation of a new

^{2/} See Hearing Designation Order, MM Docket No. 94-88, 9 FCC Rcd 3626 (1994).

noncommercial educational FM facility may not contain more than 3,000 persons, or 4,000 persons if the noncommercial educational FM station effectively installs one filter for each additional person up to 4,000 persons once the station goes on the air. See 47 C.F.R. § 73.525(c)(2). In Exhibits 9 and 9D of its August 30, 1994 amendment, CEA claims that only 2,950 persons will be adversely affected by its operation of the Holly Hill station because it will install filters for the additional 150 persons that would be otherwise adversely affected. However, the Engineering Statement of Charles Cooper of the engineering firm of DuTreil, Lundin & Rackley (attached hereto as Exhibit B) demonstrates that CEA's population figures are incorrect. Specifically, 4,238 persons will receive interference from CEA's station -- 238 persons above the 4,000 limit permitted by Section 73.525(c) assuming CEA agreed to install filters for 1,000 of the persons above the 3,000 threshold. See Engineering Statement at 4. Thus, even if CEA agreed to install filters for 1,000 individuals, its proposed operations from Holly Hill would still violate Section 73.525(c).

D. Conclusion

Based on the foregoing, WCPX has standing as a party in interest in this proceeding and it urges Judge Chachkin to grant this Petition to Intervene.

Respectfully submitted,

WCPX LICENSE PARTNERSHIP

By: Thomas J. Hutton
Ralph W. Hardy, Jr.
Thomas J. Hutton
Elizabeth A. McGeary

Its Attorneys

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April 19, 1995

EXHIBIT A

September 15, 1994
FCC Daily Release

REPORT NO. 15878

BROADCAST APPLICATIONS

PAGE NO. 4

AM BROADCAST STATION APPLICATIONS AMENDMENT RECEIVED

IL BP -940714AC WRHL 1080KHZ ROCHELLE BROADCASTING CO., INC.
ROCHELLE, IL
MD BAL -931201GP WYRE 810KHZ VISION BROADCASTING COMPANY
ANNAPOLIS, MD

ENGINEERING AMENDMENT(940907AB)

AMENDMENT (FILE NO. 940831G2)

NON-COMMERCIAL EDUCATIONAL FM APPLICATIONS ACCEPTED FOR FILING
(MINOR CHANGE APPLICATIONS ARE SIMULTANEOUSLY ACCEPTED FOR TENDER)

FL BNPED -940902JC WFSW 89.1MHZ FLORIDA STATE UNIVERSITY
PANAMA CITY, FL
RI BNPED -940830JB WORI 88.5MHZ ROGER WILLIAMS UNIVERSITY
BRISTOL, RI

MP (BPED-900112ME) FOR EXTENSION OF TIME
1ST REQUEST

MP (BPED-901023MI) FOR EXT OF TIME
1ST REQUEST

NON-COMMERCIAL EDUCATIONAL FM APPLICATIONS AMENDMENT RECEIVED

FL BNPED -930316MF NEW 90.3MHZ COMMUNITY EDUCATIONAL ASSOCIATION
HOLLY HILL, FL

FM TRANSLATOR APPLICATIONS TENDERED FOR FILING

CA 940825TD NEW 92.7MHZ ROBERT DAVIDSON
BURNLEY, CA
CA 940830TC NEW 94.9MHZ ROBERT DAVIDSON
DORRIS, CA
NV 940907TB NEW 99.3MHZ ELKO TELEVISION DISTRICT
WELLS, NV

CP NEW FM TRANSLATOR TO SERVE BURNLEY, CA, CH 224, 92.7 MHZ,
PRIMARY STATION KWHQ(FM), MT. SHASTA, CA, CH 272, 102.3 MHZ,
ENL: 40-36-09; WL: 122-39-01), TL: MT. SHASTA - BALLY 13
MILES W OF REDDING, BURNLEY, CA, ERP 0.010 KW (V)

CP NEW FM TRANSLATOR TO SERVE DORRIS, CA, CH 235, 94.9 MHZ,
PRIMARY STATION KWHQ(FM), WEED, CA, CH 272, 102.3 MHZ,
(NL: 41-37-48; WL: 122-13-50), TL: HERD PEAK, 29 MILES + 215
DEGREES FROM DORRIS, CA, ERP 0.019 KW (H)&(V)

CP NEW FM TRANSLATOR TO SERVE WELLS, NV, CH 257, 99.3 MHZ,
PRIMARY STATION KRJC(FM), ELKO, NV, CH 237, 95.3 MHZ,
(NL: 41-11-40, WL: 114-56-36), TL: 7 MILES NNE OF WELLS, NV,
ERP 0.051 KW (H)

477568

EXHIBIT B

**Engineering Statement of Charles A. Cooper
(original to be provided with Petition
for Reconsideration concurrently
filed herewith)^{3/}**

^{3/} WCPX License Partnership assumes that Mr. Cooper's Engineering Statement satisfies the provisions of Section 1.223. If, however, Judge Chachkin determines that a further supporting declaration is needed, WCPX License Partnership will provide one.

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P.C.

ENGINEERING STATEMENT
CONCERNING THE APPLICATION OF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NON-COMMERCIAL RADIO STATION
HOLLY HILL, FLORIDA

Prepared for
Station WCPX-TV
WCPX License Partnership
Orlando, Florida

This Engineering Statement has been prepared on behalf of WCPX License Partnership, licensee of station WCPX-TV on channel six (82-88 MHz) at Orlando, Florida. It concerns the application (BPED-930316MF, amended) filed by Community Educational Association for a new FM non-commercial radio station at Holly Hill, Florida (herein "Holly Hill"). It is demonstrated herein that the proposed facility will cause impermissible levels of interference to WCPX-TV as determined according to Section 73.525 of the FCC Rules.

The Holly Hill application specifies operation from a site located on Route 40 in Flagler county, Florida. It is proposed to operate as a class A facility on channel 201 (88.1 MHz) with a vertically only polarized effective radiated power (ERP) of 2 kilowatts (kW) and an antenna radiation center height above average terrain (HAAT) of 58 meters. The proposal has been studied according to the criteria set forth in Section 73.525 of the Commission's Rules to determine the level of interference that is expected to occur to viewers of WCPX-TV.

Since vertical-only polarization is proposed with a nominal ERP of 2 kW, an equivalent horizontally

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polarized ERP of 0.05 kW was determined according to Section 73.525 (e) (4) (i) using an adjustment figure of 40 for calculation purposes. The distances to the appropriate interfering contours were calculated using terrain averages obtained from the National Geophysical Data Center (N.G.D.C.) 30-second computer database. It is noted that the 6 dB adjustment was not employed to determine the interfering contour as directed by Section 73.525 (e) (4) (i) of the Commission's Rules. The WCPX-TV protected contours were determined based on terrain data extracted from the N.G.D.C. 30-second computer database. All distances to coverage and interfering contours were calculated at ten degrees intervals using the pertinent directional antenna relative field values for both Holly Hill and WCPX-TV.

The proposed Holly Hill transmitter site is located 76 kilometers from WCPX-TV at a bearing of 353 degrees true. To determine the predicted interference area to WCPX-TV from Holly Hill, the value of the WCPX-TV coverage contours and the associated Holly Hill interfering contours were interpolated from Figure 1 shown in Section 73.599. The WCPX-TV coverage contour values, Undesired-to-Desired (U/D) ratios, and Holly Hill interference contour values are tabulated below:

WCPX-TV Coverage Contour (dBu)	Undesired-To- Desired Ratio (dB)	Holly Hill Interfering Contour (dBu)
64	-4.0	60.0
63	-4.0	59.0
62	-3.5	58.5
61	-3.5	57.5

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WCPX-TV Coverage Contour (dBu)	Undesired-To- Desired Ratio (dB)	Holly Hill Interfering Contour (dBu)
60	-3.0	57.0
59	-2.5	56.5
58	-2.5	55.5
57	-2.0	55.0

As can be seen above, for each integer increment in the WCPX-TV contour value, the associated D/U ratio was interpolated to the nearest one-half decibel value. The predicted interference area was then calculated as the area bounded within the WCPX-TV and Holly Hill contour locus intersections.

The Holly Hill predicted interference area to WCPX is projected onto Figure 1 which shows the 1990 Census Florida County Outline subdivisions and cities. The Holly Hill applicant claims that 3,000 persons are predicted to receive interference to WCPX-TV (see Exhibit #9, footnote 3 in the Holly Hill application). The applicant also pledges to install 150 radio-frequency filters in order to decrease the number of affected persons pursuant to Section 73.525(c)(2). However, our analysis demonstrates that greater than 4,000 persons are predicted to receive interference, which is prohibited by the Commission.

Using the Commission's uniform distribution method, described in Section 73.525(e)(2), of determining the population contained in the interference area, the population encompassed by the interference area is

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calculated to be 4,238 persons as shown on Figure 2; the supporting Census population and area values are tabulated on Figure 3. This value is 238 persons over the maximum threshold assuming 1,000 radio-frequency filters are installed on television receivers located within the predicted interference area. If filters are not installed by the applicant, than the impermissible value is 1,238 persons over the maximum threshold of 3,000 persons.

It is concluded that the Holly Hill facility will result in predicted interference to viewers of WCPX in excess of that permitted by the FCC Rules.



Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
240 N. Washington Blvd., Suite 700
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April 18, 1995

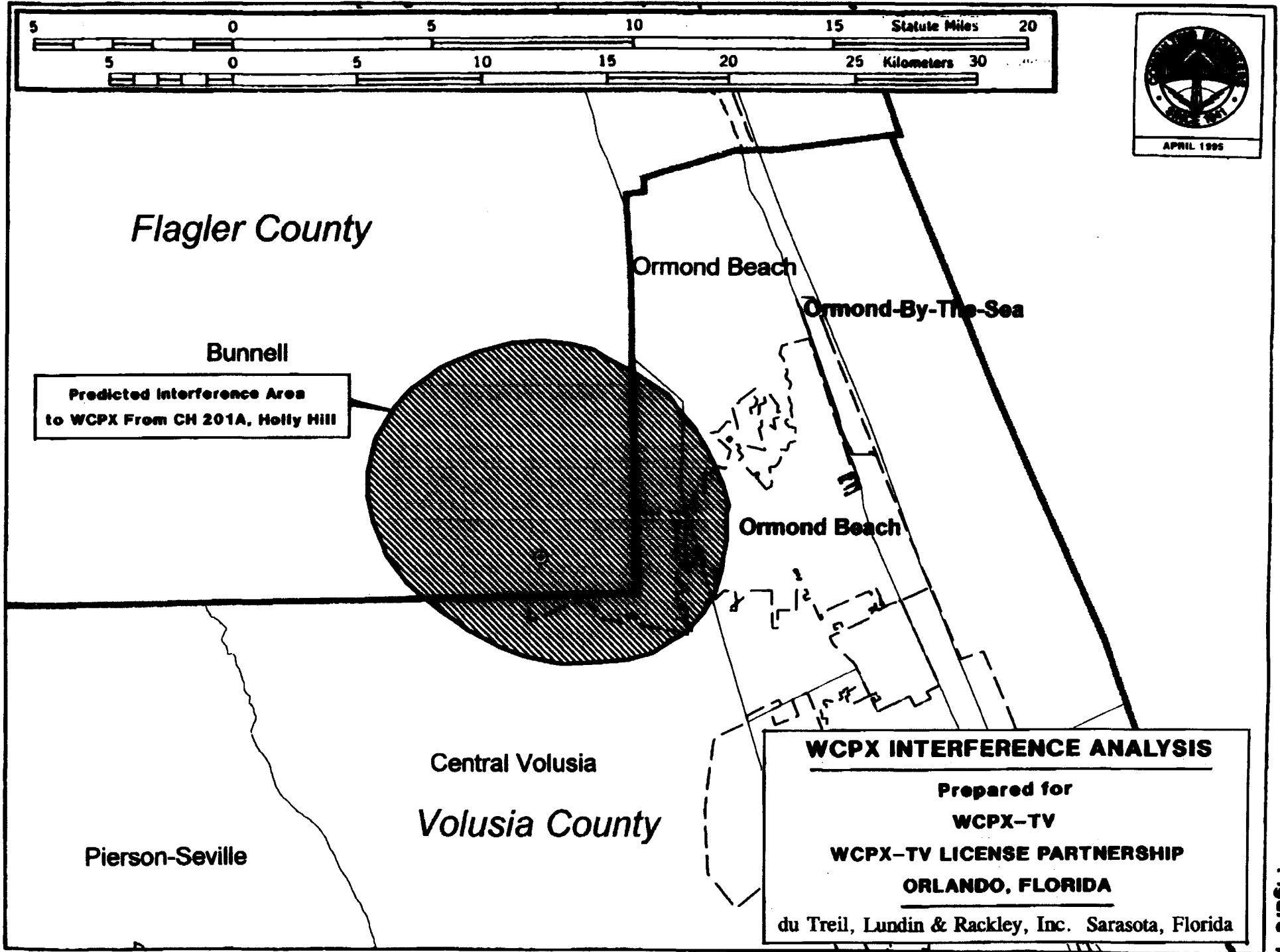


Figure 2

ENGINEERING STATEMENT
CONCERNING THE APPLICATION OF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NON-COMMERCIAL RADIO STATION
HOLLY HILL, FLORIDA

Tabulation of Persons within WCPX-TV Interference Area

	<u>Percent of Area</u>	<u>Population in Area</u>
Flagler County		
Bunnell Division	9.0	624
Volusia County		
Central Volusia Division	2.8	211
Ormond Beach City (part)	99.5	736
Ormond Beach Division	4.1	477
Ormond Beach City (part)	9.6	<u>2,190</u>
Total:		4,238

Table 8 Population and Housing Units, 1970 to 1990; Area Measurements and Density: 1990 — Con.

For information concerning historical counts, see "User Notes." Density is computed using land area. For definitions of terms and meanings of symbols, see (a).

State County County Subdivision Place	Population				Housing units				1990 area measurements				1990 density			
	1990	1980	1970		1990	1980	1970		Square kilometers	Square miles	Total area	Square kilometers	Square miles	Population per	Square mile	Square mile
DeSoto County	23 865	19 039	13 060		10 310	7 458	4 095		1 656.4	639.6	2 237.0	1 650.7	637.3	14.5	37.4	6.2
Archieville	15 661	12 985	5 658		6 482	5 077	2 100		970.1	355.2	70.1	917.5	354.3	17.1	44.2	7.3
Archieville city (pt.)	6 488	6 002	5 658		2 835	2 575	2 100		10.3	4.0	10.3	10.3	4.0	629.9	1 622.0	275.2
Southwest Archieville CDP	4 145	1 940	...		1 940		19.0	7.3	19.0	19.0	7.3	211.2	567.8	102.1
Archieville West division	8 204	6 454	...		3 628	2 361	...		736.3	284.3	736.3	733.1	283.1	11.2	29.0	4.9
Archieville city (pt.)
Dade County	10 585	7 251	5 480		6 445	4 010	1 884		2 237.0	863.7	1 823.5	1 823.5	704.1	5.8	15.0	9.2
Cross City North division	7 233	5 375	2 248		3 487	2 129	751		765.6	295.6	765.6	753.5	290.9	9.6	24.9	12.7
Cross City town	2 041	2 154	...		993	921	...		4.9	1.9	4.9	4.9	1.9	416.5	1 074.2	207.7
Cross City South division	3 352	2 376	...		2 758	1 881	...		1 471.4	568.1	1 471.4	1 090.0	413.1	3.1	8.1	4.7
Horseshoe Beach town	2 252	304	124		306	365	67		504.0	1 260.0	612.0
Duval County	672 971	571 003	528 865		264 672	227 077	174 309		2 378.4	918.3	2 004.3	2 004.3	773.9	335.8	869.6	142.0
Jacksonville division	672 971	571 003	528 865		264 672	227 077	174 309		2 378.4	918.3	2 004.3	2 004.3	773.9	335.8	869.6	142.0
Atlantic Beach city	11 636	7 847	6 132		4 948	3 104	...		19.4	7.5	19.4	19.4	7.5	472.9	1 235.5	256.3
Baldwin town	1 450	1 526	1 408		603	587	...		5.2	2.0	5.2	5.2	2.0	278.8	725.0	301.5
Jacksonville Beach city	17 839	15 462	12 779		8 709	7 796	...		56.9	22.0	56.9	56.9	22.0	896.4	2 316.8	437.6
Jacksonville city (remainder)	635 230	540 920	504 265		267 148	213 556	164 952		2 279.2	880.0	1 965.0	1 965.0	758.7	323.3	837.3	136.0
Neptune Beach city	8 616	5 248	4 281		3 265	2 534	...		17.7	6.8	17.7	17.7	6.8	1 081.9	2 840.0	518.3
Escambia County	262 798	233 794	205 334		112 230	89 661	65 141		2 315.3	893.9	1 718.8	1 718.8	663.6	132.9	356.0	55.3
Conformant division	34 746	23 389	13 433		13 166	7 936	3 692		331.3	127.9	331.3	325.5	125.7	106.7	276.4	40.4
Enclave CDP (pt.)	4 879	3 549	...		2 083	1 458	...		10.4	4.0	10.4	10.4	4.0	469.1	1 219.6	320.6
Ferry Pass CDP (pt.)	5 242	2 493	...		1 990	703	...		9.6	3.7	9.6	9.6	3.7	551.8	1 416.6	209.5
Gonzalez CDP	7 669	6 084	...		2 873	2 120	...		29.2	11.3	29.2	29.2	11.3	262.6	678.7	96.4
Century town	8 395	6 333	...		3 317	2 892	2 548		506.6	195.6	506.6	501.6	192.7	16.7	43.3	5.7
Century town	1 989	6 495	...		872	176	...		8.6	3.3	8.6	8.6	3.3	234.0	602.7	102.6
Midway CDP (pt.)	1 063	1 027	...		396	310	...		16.8	6.5	16.8	16.8	6.5	63.7	166.8	23.8
Northwest Escambia division	3 864	2 985	2 879		1 402	1 190	918		481.5	185.9	481.5	481.5	185.9	6.0	20.8	2.9
Midway CDP (pt.)	1 444	1 090	...		51	139	160.9	360.9	56.7
Midway CDP (pt.)	215 793	199 087	...		94 325	76 843	...		995.9	384.5	995.9	995.9	384.5	325.3	861.9	127.5
Pensacola division	19 386	13 339	...		7 854	5 718	...		20.8	8.0	20.8	20.8	8.0	225.2	593.1	87.6
Bent CDP	21 624	15 872	...		4 488	3 793	...		37.2	14.4	37.2	37.2	14.4	793.5	2 069.4	313.4
Enclave CDP (pt.)	1 485	1 413	...		9 488	5 764	...		19.4	7.5	19.4	19.4	7.5	593.0	1 531.1	246.5
Ferry Pass CDP (pt.)	1 139	5 352	...		415	1 934	...		29.1	11.2	29.1	29.1	11.2	723.7	1 880.3	283.2
Golden CDP	17 487	14 238	...		6 471	4 581	4 481		3.2	1.2	3.2	3.2	1.2	1 999.7	5 145.8	764.3
Myrtle Grove CDP	58 145	47 619	...		26 366	23 312	21 043		102.4	39.6	102.4	102.4	39.6	1 017.7	2 636.7	408.9
Pensacola city	18 040	15 792	...		7 553	7 040	5 886		24.0	9.3	24.0	24.0	9.3	992.4	2 571.7	378.4
Warrington CDP	22 107	24 371	20 924		10 032	9 923	7 410		19.3	7.4	19.3	19.3	7.4	157.4	408.4	59.5
West Pensacola CDP
Flagler County	28 701	10 913	4 454		15 215	5 891	1 867		1 256.2	570.8	1 478.3	1 256.2	485.0	22.8	59.2	12.1
Bunnell division	13 765	4 146	...		6 108	1 630	427.3		1 153.9	445.5	1 153.9	1 067.7	427.3	12.4	32.2	5.5
Bunnell city	1 873	1 816	...		778	675	546		7.4	2.9	7.4	7.4	2.9	253.1	645.9	98.4
Palm Coast CDP (pt.)	4 971	6 747	...		2 430		16.5	6.4	16.5	16.5	6.4	301.3	776.7	379.1
Roger Beach division	14 936		9 107	4 261	...		324.5	125.3	324.5	324.5	125.3	99.9	258.9	60.9
Beverly Beach town	312	217	...		253	197	...		1.0	0.4	1.0	1.0	0.4	346.7	780.0	283.1
Flagler Beach city	3 820	2 208	...		2 641	1 540	613		10.5	4.0	10.5	9.4	3.6	406.4	1 061.1	283.1
Marina division
Marina town (pt.)
Palm Coast CDP (pt.)	9 316	2 837	...		5 092	1 559	...		37.6	14.5	37.6	35.0	13.5	266.2	690.1	185.5
Franklin County	8 967	7 661	...		5 891	4 497	3 409		2 458.5	1 028.4	1 478.3	1 383.0	534.0	6.5	16.8	4.3
Apalachicola division	4 443	3 117	...		2 727	2 013	1 376		863.1	333.2	863.1	863.1	333.2	21.7	56.2	13.3
Apalachicola city	2 602	2 345	...		1 190	1 001	...		6.8	2.7	6.8	6.8	2.7	551.0	1 389.5	242.9
Carabelle division	2 528	2 075	...		2 214	1 703	...		84.3	32.6	84.3	84.3	32.6	6.1	15.2	3.3
Carabelle city (pt.)	1 173	1 804	...		643	632	...		7.1	2.7	7.1	7.1	2.7	221.3	566.3	128.9
Eastpoint division	1 996	1 669	...		1 374	781	627		950.1	364.8	950.1	769.1	293.6	2.6	6.8	1.2
Carabelle city (pt.)
Eastpoint CDP	1 577	1 246	...		683	490	485		19.0	7.3	19.0	19.0	7.3	63.0	216.0	34.9
Gadsden County	41 105	41 674	39 184		14 859	13 387	10 268		1 348.9	528.5	1 348.9	1 348.9	516.2	30.7	79.6	11.1
Chattahoochee division	6 325	7 179	...		2 023	1 927	1 446		75.2	29.0	75.2	75.2	29.0	32.5	84.1	10.4
Chattahoochee city	4 382	5 332	...		1 240	1 264	1 183		14.6	5.6	14.6	14.6	5.6	310.8	811.5	10.4
Greensboro division	2 889	2 574	...		1 023	904	...		182.2	70.4	182.2	181.9	70.2	15.9	41.2	8.9
Greensboro town	586	562	...		224	198	...		2.6	1.0	2.6	2.6	1.0	225.4	586.0	5.6
Hawkins division	11 024	9 063	...		4 244	3 094	...		393.2	151.8	393.2	384.1	148.3	28.7	74.3	11.0
Hawkins town	452	2 782	...		718	942	...		4.8	1.9	4.8	4.8	1.9	344.6	870.5	149.6
Midway city
Midway division	20 867	22 658	...		7 569	7 480	...		9.2	3.5	9.2	9.2	3.5	92.6	243.4	33.4
Quincy division	1 981	1 551	...		531	414	...		596.6	230.3	596.6	576.1	222.4	36.2	93.8	13.1
Greene city	7 444	8 591	...		2 883	2 983	2 633		16.1	6.2	16.1	16.1	6.2	450.2	1 165.3	170.7
Quincy city
Galtzert County	9 667	5 767	...		4 071	2 647	1 253		903.6	355.5	903.6	903.6	348.9	10.7	27.7	4.5
Bed division	2 917	2 240	...		1 334	1 199	...		379.7	146.7	379.7	379.7	143.7	7.8	20.3	4.1
Bed town	6 871	3 227	...		1 111	1 133	...		3.3	1.3	3.3	3.3	1.3	80.9	203.4	33.6
Fronton division	6 250	3 277	...		2 571	1 448	...		543.3	208.8	543.3	513.3	205.8	12.2	32.9	4.8
Fronton city
Fronton Springs city (pt.)
Trenton city	1 287	1 131	...		507	498	361		4.1	1.6	4.1	4.1	1.6	313.9	804.4	123.7

Table 8. Population and Housing Units, 1970 to 1990; Area Measurements and Density: 1990—Con

For information concerning historical counts, see "User Notes." Density is computed using land area. For definitions of terms and meanings of symbols, see text.

State County County Subdivision Place	Population			Housing units			1990 area measurements				1990 density			
							Total area		Land area		Population per		housing units per	
	1990	1980	1970	1990	1980	1970	Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile
Union County	10 252	10 166	8 112	2 975	2 329	1 745	646.8	249.7	622.4	240.3	16.5	42.7	4.8	12.4
Lake Butler division	5 796	4 661	3 118	1 497	1 158	801	309.1	119.4	289.1	111.6	20.0	51.9	5.2	13.4
Lake Butler city	2 116	1 830	1 598	811	701	541	4.7	1.8	4.5	1.7	470.2	1 244.7	180.2	477.7
Raiford division	2 194	3 876	3 729	604	584	540	163.7	63.2	163.6	63.2	13.4	34.7	3.7	9.6
Raiford town	198	259	...	89	105	...	1.4	...	1.4	...	141.4	396.0	63.6	178.0
Worthington division	2 262	1 669	1 265	874	587	404	174.0	67.2	169.7	65.5	13.3	34.5	5.2	13.3
Worthington Springs town	178	220	214	76	80	66	9	4	9	4	197.8	445.0	84.4	190.0
Volusia County	370 712	256 762	169 487	180 972	124 427	70 605	3 710.2	1 432.5	2 864.2	1 105.9	129.4	335.2	63.2	163.6
Central Volusia division	12 513	5 564	...	4 053	2 113	...	1 146.1	442.5	1 111.7	429.2	11.3	29.2	3.6	9.4
Daytona Beach city (pt.)	136	2	16.7	6.5	16.7	6.5	8.1	20.9	1	3
Daytona CDP (pt.)
Ormond Beach city (pt.)	739	263	12.6	4.9	12.6	4.9	58.7	150.8	20.9	53.7
Port Orange city (pt.)	761	176	...	437	120	...	8.7	3.4	9.6	3.2	90.6	237.8	52.0	134.4
Somerset Spruce Creek CDP	3 404	1 971	...	1 475	711	...	60.3	23.3	60.3	23.3	56.5	146.1	24.5	63.3
Daytona Beach division	42 088	40 405	...	19 521	16 602	...	56.3	21.7	53.9	20.8	780.9	2 023.5	362.2	938.5
Daytona Beach city (pt.)	40 429	38 010	(NA)	18 751	15 657	(NA)	50.6	19.5	48.2	18.6	838.8	2 173.6	389.0	1 008.1
De Bary-Orange City division	22 489	13 001	...	11 255	6 849	...	121.5	46.9	110.9	42.8	225.4	581.5	101.5	263.0
De Bary CDP	7 176	4 980	3 154	3 404	2 650	1 667	19.4	7.5	19.2	7.4	373.8	969.7	177.3	460.0
De Land city (pt.)
Orange City city	5 347	2 795	1 777	3 041	1 505	835	14.6	5.7	14.5	5.6	368.8	954.8	209.7	543.0
De Land division	44 531	38 205	...	19 666	16 258	...	322.9	124.7	294.9	113.9	151.0	391.0	66.7	172.7
De Land city (pt.)	16 491	15 354	11 641	7 724	6 689	4 530	25.0	9.6	24.9	9.6	662.3	1 717.8	310.2	804.6
De Land Southwest CDP	1 249	1 481	...	524	626	...	1.7	...	1.7	...	1 784.3	308.2	748.6	...
De Leon Springs CDP	1 481	1 669	1 134	576	672	458	6.8	2.6	6.8	2.6	217.8	569.6	84.7	221.5
Lake Helen city (pt.)	...	24	(NA)	...	6	(NA)
North De Land CDP	1 493	1 557	...	627	674	...	1.6	...	1.6	...	933.1	2 488.3	391.9	1 045.0
West De Land CDP	3 389	3 055	...	1 319	1 230	...	6.1	2.4	5.5	2.4	555.6	1 412.1	216.2	549.6
Daytona division	55 425	19 379	...	22 828	9 409	...	302.8	116.9	263.8	101.9	210.1	543.9	86.5	224.0
Daytona CDP (pt.)	50 828	15 710	4 868	20 744	7 881	2 587	144.3	55.7	136.0	52.5	373.7	968.2	152.5	395.1
Lake Helen city (pt.)	2 344	2 023	(NA)	1 033	812	(NA)	10.5	4.1	10.3	4.0	227.6	586.0	100.3	258.3
New Smyrna division	45 217	29 676	...	26 261	17 326	...	600.4	231.8	306.5	118.3	147.5	382.2	85.7	222.0
Edgewater city	15 337	6 726	3 348	6 888	3 182	1 478	19.7	7.6	18.9	7.3	811.5	2 101.0	364.4	943.6
Glencoe CDP	2 282	1 040	...	1 008	680	...	22.9	8.9	22.8	8.8	100.1	259.3	44.2	114.5
New Smyrna Beach city	16 543	13 557	10 580	11 476	8 698	5 297	45.8	17.7	38.0	14.7	435.3	1 125.4	302.0	780.7
Oak Hill city	917	938	747	376	374	...	26.8	10.4	26.8	10.4	65.5	169.8	26.9	69.6
Ponce Inlet town (pt.)	4.7	1.8
Port Orange city (pt.)	5.4	2.1
North Peninsula division	27 872	29 065	...	17 657	17 095	...	165.3	63.8	21.5	8.3	1 296.4	3 358.1	821.3	2 127.3
Daytona Beach city (pt.)	12 489	9 067	(NA)	8 315	8 870	(NA)	13.1	5.1	4.9	2.5	1 892.3	4 995.6	1 259.8	3 326.0
Ormond Beach city (pt.)	6 258	6 892	(NA)	3 483	3 513	(NA)	7.9	3.0	6.0	2.3	1 043.0	2 720.9	580.5	1 514.3
Ormond-By-The-Sea CDP	8 157	7 465	6 002	5 241	4 322	2 992	5.2	2.0	5.1	2.0	1 599.4	4 078.5	1 027.6	2 620.5
Ormond Beach division	45 399	35 620	...	21 148	15 077	...	145.9	56.3	138.2	53.4	328.5	850.2	153.0	396.0
Daytona Beach city (pt.)
Holly Hill city	11 141	9 953	8 191	5 652	4 870	3 531	10.7	4.1	9.0	3.5	1 237.9	3 183.1	628.0	1 614.9
Ormond Beach city (pt.)	22 724	14 544	(NA)	10 444	5 793	(NA)	49.3	19.0	46.6	18.0	1 262.4	3 263.6	223.6	580.2
Pierson-Saville division	8 233	4 934	3 246	2 529	2 003	1 377	665.3	256.9	479.6	185.2	17.2	44.5	5.3	13.7
Pierson town	2 988	1 085	654	410	255	...	21.4	8.3	19.8	7.7	150.9	388.1	20.7	53.2
Port Orange division	58 505	35 600	...	29 281	17 268	...	81.2	31.3	71.7	27.7	816.0	2 112.1	408.4	1 057.1
Daytona Beach city (pt.)	7 059	2 169	(NA)	4 155	1 407	(NA)	10.1	3.9	10.1	3.9	698.9	1 810.0	411.4	1 065.4
Ponce Inlet town (pt.)	5.2	2.0	3.2	1.2
Port Orange city (pt.)	34 187	18 247	3 781	16 336	8 543	1 659	42.0	16.2	38.5	14.8	888.0	2 309.9	424.3	1 103.8
South Daytona city (pt.)	12 482	11 181	4 979	6 122	5 056	1 943	12.1	4.7	9.1	3.5	1 371.6	3 566.3	672.7	1 749.1
South Daytona division	8 440	7 113	5 317	6 773	4 427	2 374	102.4	39.6	11.4	4.4	1 371.6	3 566.3	672.7	1 749.1
Daytona Beach city (pt.)	1 808	944	2.9	1.1	1.5	...	1 205.3	3 013.3	629.3	1 573.3
Daytona Beach Shores city	2 335	1 324	768	2 852	1 267	371	2.3	...	2.3	...	1 061.4	2 594.4	1 296.4	3 168.9
Ponce Inlet town (pt.)	1 704	1 003	328	1 340	731	142	28.1	10.8	5.2	2.0	327.7	852.0	257.7	670.0
Port Orange city (pt.)	369	333	...	246	192	...	1.0	1 845.0	3 690.0	1 230.0	2 460.0
South Daytona city (pt.)	...	71	38
Wakulla County	14 202	10 887	6 308	6 587	5 072	2 726	1 905.7	735.8	1 571.3	606.7	9.0	23.4	4.2	10.9
East Wakulla division	10 004	7 346	3 732	4 245	3 109	1 511	1 000.8	384.4	765.5	295.5	13.1	33.9	5.5	14.4
St. Marks city	307	286	366	172	212	192	4.4	1.7	4.4	1.7	69.8	180.6	39.1	101.2
West Wakulla division	4 198	3 541	2 576	2 342	1 963	1 215	904.8	349.4	805.9	311.2	5.2	13.5	2.9	7.5
Sapchucky city	367	444	460	187	209	188	3.7	1.4	3.7	1.4	99.2	262.1	50.5	133.6
Walton County	27 760	21 300	16 087	18 728	10 918	6 597	3 206.8	1 238.1	2 739.4	1 057.7	10.1	26.2	6.8	17.7
De Funiak Springs division	9 479	8 219	6 797	4 648	3 572	2 531	665.8	334.3	658.3	253.4	11.0	28.6	5.4	14.1
De Funiak Springs city	5 120	5 563	4 966	2 465	2 387	1 885	28.0	10.8	27.3	10.5	187.5	487.6	90.3	234.1
Freeport division	10 345	5 494	3 198	10 453	4 247	1 978	1 175.4	453.8	723.1	279.2	14.3	37.1	14.5	37.1
Freeport city	843	669	518	394	292	204	15.9	6.1	15.8	6.1	53.4	138.2	25.1	64.1
Miramar Beach CDP	1 644	3 834	12.2	4.7	11.9	4.6	138.2	357.4	32.2	83.3
Paxton-Darlington division	5 748	5 371	4 282	2 608	2 221	1 495	847.6	327.2	842.8	325.4	6.8	17.7	3.1	8.0
Paxton town	600	659	243	264	273	89	10.3	4.0	10.1	3.9	59.4	153.8	26.3	68.0
Redbay division	2 188	2 216	1 810	1 019	878	593	317.9	122.8	315.2	121.7	6.9	18.0	3.2	8.0

CERTIFICATE OF SERVICE

I, Vanese E. Hargrove, hereby certify that a true and correct copy of the foregoing "Petition to Intervene" was sent this 19th day of April, 1995, by first class, United States mail, postage prepaid, to the following:

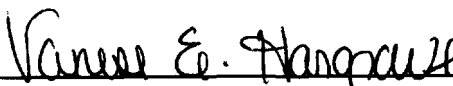
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